

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	Chapter 11
	:	
WOPIRB, LLC	:	Case No. 23-12722 (MDC)
	:	
	:	
Debtor	:	
	:	
	:	

**UNITED STATES TRUSTEE’S MOTION TO  
CONVERT OR DISMISS CASE**

The United States Trustee for Region Three, by and through his undersigned counsel, pursuant to 11 U.S.C. Section 1112(b), requests the Court to enter an Order converting the above-captioned case to Chapter 7, or in the alternative, dismissing this case, and in support thereof states as follows:

1. Andrew R. Vara is the United States Trustee (“UST”) for this jurisdiction.
2. Pursuant to 28 U.S.C. Section 586, the United States Trustee is responsible for the supervision and administration of all cases filed under Chapter 11 of the Bankruptcy Code. The United States Trustee has standing to request conversion or dismissal of this case. 11 U.S.C. §§ 307, 1112(b).
3. The United States Trustee consents to the entry of a final judgment.
4. The debtor filed a petition for relief under Chapter 11 of the Bankruptcy Code on or about September 11, 2023. Since that date, the debtor has remained in possession of her assets and has operated as a debtor-in-possession. 11 U.S.C. §§ 1107, 1108.

5. 11 U.S.C. § 1112 provides for the conversion or dismissal of Chapter 11 cases. Under that section, after notice and hearing, for cause shown, the Court may convert or dismiss a case, whichever is in the best interest of creditors and estate. 11 U.S.C. § 1112(b).

6. The debtor has failed to file current monthly operating reports.

7. The debtor has failed to pay all quarterly fee obligations owed pursuant to 28 U.S.C. § 1930.

8. The debtor has caused unreasonable delay that is prejudicial to creditors.

**WHEREFORE**, based on the foregoing, the United States trustee requests that the case be converted or dismissed.

Respectfully submitted,

ANDREW R. VARA  
United States Trustee  
For Regions 3 and 9

BY: /s/ Kevin P. Callahan  
KEVIN P. CALLAHAN  
Trial Attorney  
Office of the U.S. Trustee  
Robert N. C. Nix Sr. Federal Building  
900 Market Street, Room 320  
Philadelphia, PA 19107  
Telephone: (215) 597-4411  
Facsimile: (215) 597-5795

Dated: February 8, 2024